

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CONNECTICUT**

JEWISH FEDERATION OF METROPOLITAN  
CHICAGO,

Plaintiff,

v.

BAYOU MANAGEMENT, LLC, SAMUEL ISRAEL, III,  
DANIEL MARINO, BAYOU GROUP, LLC, BAYOU  
SECURITIES, LLC, BAYOU ADVISORS, LLC, BAYOU  
EQUITIES, LLC, BAYOU FUND, LLC, BAYOU SUPER  
FUND, LLC, BAYOU NO LEVERAGE FUND, LLC,  
BAYOU AFFILIATES FUND, LLC, BAYOU  
ACCREDITED FUND, LLC, BAYOU OFFSHORE  
FUND, LLC, BAYOU OFFSHORE FUND A, LTD,  
BAYOU OFFSHORE FUND B, LTD, BAYOU  
OFFSHORE FUND C, LTD, BAYOU OFFSHORE FUND  
D, LTD, BAYOU OFFSHORE FUND E, LTD, BAYOU  
OFFSHORE FUND F, LTD, BAYOU OFFSHORE  
MASTER FUND, LTD, and DOES 1-25, Inclusive,

Defendants.

Civil Action No. 3:05CV01401 (SRU)

October 5, 2005

**APPLICATION FOR ENTRY OF DEFAULT**

Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, Plaintiff, the Jewish Federation of Metropolitan Chicago (the "Federation"), respectfully requests that the Court enter a default against Defendants Bayou Management, LLC, Bayou Group, LLC, Bayou Securities, LLC, Bayou Advisors, LLC, Bayou Equities, LLC, Bayou Fund, LLC, Bayou Super Fund, LLC, Bayou No Leverage Fund, LLC, Bayou Affiliates Fund, LLC, Bayou Accredited Fund, LLC, and Bayou Offshore Fund, LLC (collectively "Defendants")<sup>1</sup> for failure to appear, answer, plead in

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<sup>1</sup> The Federation has not sought an entry of default against Bayou Offshore Fund A, Ltd., Bayou Offshore Fund B, Ltd., Bayou Offshore Fund C, Ltd., Bayou Offshore Fund D, Ltd., Bayou Offshore Fund E, Ltd., Bayou Offshore Fund F, Ltd., and Bayou Offshore Master Fund, Ltd., as each of them is currently the subject of an Ancillary Proceeding in the United States Bankruptcy Court for the District of Connecticut.

or otherwise defend this action, as stated in the affidavit attached hereto. In support of this motion, the Federation submits the attached Affidavit (attached hereto as Exhibit 1) and further states as follows:

1. On September 2, 2005, the Federation filed the Complaint in the above-captioned matter.

2. Defendants Bayou Management, LLC, Bayou Securities, LLC, and Bayou Fund, LLC are limited liability companies organized under the laws of New York with principal places of business in Stamford, Connecticut.

3. Defendant Bayou Group, LLC is a limited liability company organized under the laws of Connecticut with a principal place of business in Stamford, Connecticut.

4. Defendants Bayou Advisors, LLC, Bayou Equities, LLC, Bayou Super Fund, LLC, Bayou No Leverage Fund, LLC, Bayou Affiliates Fund, LLC, Bayou Accredited Fund, LLC, and Bayou Offshore Fund, LLC are limited liability companies organized under the laws of Delaware with principal places of business in Stamford, Connecticut.

5. Service of process was completed as to each of the Defendants pursuant to Conn. Gen. Stat. § 52-45 *et seq.* by September 11, 2005, by service of a Summons and Complaint on the Defendants' respective registered agents and served via certified mail at their registered service of process addresses. Copies of the affidavits of service for each Defendant are attached to the Affidavit as Exhibit A.

6. The time within which Defendants shall serve a responsive pleading or otherwise defend as required by Rule 12(a) of the Federal Rules of Civil Procedure has expired, and Defendants have failed to file an answer or otherwise defend the Complaint.

WHEREFORE, Plaintiff, the Federation, through its attorneys, respectfully requests that the Defendants be defaulted.

Respectfully submitted,

Jewish Federation of Metropolitan Chicago  
By its attorneys,

/s/ Kent D.B. Sinclair

William L. Prickett, Fed. Bar No. ct20907

Kent D.B. Sinclair, Fed. Bar No. ct14649

Jodi D. Luster, *phv0543*

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**CERTIFICATE OF SERVICE**

I do hereby certify that I have served a copy of the forgoing document this 5th day of October, 2005, by first class mail, postage prepaid, to all persons identified on attached service list.

/s/ Kent D.B. Sinclair

Kent D.B. Sinclair

Service List

*Bayou Management, LLC:*

Bayou Management, LLC  
40 Signal Road  
Stamford, CT 06902

Bayou Management, LLC  
c/o Faust Rabbach & Oppenheim  
488 Madison Avenue  
New York, NY 10022

Bayou Management, LLC  
c/o Samuel Israel, III  
52 Oregon Road  
Bedford Corners, NY 10549

*Samuel Israel, III:*

Samuel Israel, III  
52 Oregon Road  
Bedford Corners, NY 10549

*Daniel Marino:*

Andrew B. Bowman, Esq.  
1804 Post Road East  
Westport, CT 06880

*Bayou Group, LLC:*

Bayou Group, LLC  
c/o National Registered Agents, Inc.  
Alex Tighe  
12 Old Boston Post Road  
Old Saybrook, CT 06475

*Bayou Securities, LLC:*

Bayou Securities, LLC  
c/o Samuel Israel, III  
52 Oregon Road  
Bedford Corners, NY 10549

Bayou Securities, LLC  
c/o Thomas J. Williams, Esq.  
16 Ann Jin Drive  
Greenwich, CT 06830

Service List (cont.)

*Bayou Advisors, LLC:*

Bayou Advisors, LLC  
c/o Faust, Rabbach & Oppenheim  
488 Madison Avenue  
New York, NY 10022

*Bayou Equities, LLC:*

Bayou Equities, LLC  
c/o Faust, Rabbach & Oppenheim  
488 Madison Avenue  
New York, NY 10022

*Bayou Fund, LLC:*

Bayou Fund, LLC  
40 Signal Road  
Stamford, CT 06902

Bayou Fund, LLC  
c/o Samuel Israel, III  
52 Oregon Road  
Bedford Corners, NY 10549

*Bayou Super Fund, LLC:*

Bayou Super Fund, LLC  
40 Signal Road  
Stamford, CT 06902

*Bayou No Leverage Fund, LLC:*

Bayou No Leverage Fund, LLC  
40 Signal Road  
Stamford, CT 06902

*Bayou Affiliates Fund, LLC:*

Bayou Affiliates Fund, LLC  
40 Signal Road  
Stamford, CT 06902

*Bayou Accredited Fund, LLC:*

Bayou Accredited Fund, LLC  
40 Signal Road  
Stamford, CT 06902

Service List (cont.)

*Bayou Offshore Fund, LLC:*

Bayou Offshore Fund, LLC  
40 Signal Road  
Stamford, CT 06902